
Title VI Implementation Plan



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Executive Summary

The City of Douglas, incorporated in 1905, is a municipal government agency. The City provides essential public services to the community of Douglas. One of the public services provided by the City of Douglas is public transit, through Douglas Rides. Douglas Rides is operated under the Transit/Tourism Department as can be seen by the attached organizational chart. The City of Douglas is a recipient of 5311 grant funds for transit operations and has been a grantee since 2012.

Douglas Rides, with service open to the general public, operates 7 routes with over 50 stops throughout the City of Douglas. All routes originate from a central transfer point located at 11th Street between “G” and “H” Avenues.

These routes include:

- Midtown
- Pirtleville - Bay Acres – Downtown
- Elfrida
- Dial-A-Ride
- Bisbee/Cochise College/ACT Connection
- Cochise Connection

Service operates Monday through Saturday, 6 days a week between the hours of 8 a.m. and 5 p.m. The Cochise Connection route operates Monday through Friday from 6a.m. to 7p.m. and Saturdays from 8:23 a.m. to 5:24 p.m.

Douglas Rides provides transportation to elderly and disabled clients in a manner that goes above and beyond ADA requirements.

The deviated fixed route system goes up to 1mile from the established route to provide service to elderly and disabled clients who wish to use the fixed route system but cannot get to an established stop. This includes deviations necessary to deliver elderly and disabled riders to their destinations, as long as the deviations are scheduled in advance with the dispatcher and can be made in a safe and efficient manner that does not severely affect the schedule.

In addition Douglas Rides provides the following services;

- Contracts with Southeastern Arizona Government Organization (SEAGO Area Agency on Aging) to provide transportation to the elderly and the disabled in the following communities:
 - o In the City of Douglas, Dial-A-Ride service is provided by the Douglas Rides program, and requires a 24 hour advance notice.
 - o Inter-city service is provided to Elfrida one day a week, every other week. Elderly and disabled clients are brought to Douglas for grocery shopping, nutrition services, and medical appointments.

The Dial-A-Ride system offers door to door service to residents of Douglas, Pirtleville and Elfrida. These services are offered to those with disabilities regardless of age.

- Contracts with Cochise College to provide students free rides Monday through Thursdays four times a day. This route loops from Douglas, the College, Bisbee and

- back.
- **Contracts with Advanced Call Center Technologies, a Call Center in Douglas to provide rides to employees to and from work**

What type of program fund(s) did you apply for?

5310

☒

5311

Other (please explain) _____

Type of Funding Requests? (Select all that apply)

☒

Vehicle Funds

☒

Operating Funds

☒

Other (please explain) Capital Funds and Planning Funds

Non Discrimination Policy Statement

The City of Douglas / Douglas Rides policy assures full compliance with Title VI of the Civil Rights act of 1964, the Restoration Act of 1987, section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act of 1990 (ADA), and related statutes and regulations in all programs and activities. Title VI states that "no person shall on the grounds of race, color, national origin, or disability be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination" under any City Of Douglas / Douglas Rides sponsored program or activity. There is no distinction between the sources of funding.

City of Douglas / Douglas Rides also assures that every effort will be made to prevent discrimination through the impacts of its programs, policies and activities on minority and low-income populations. Furthermore, City of Douglas / Douglas Rides will take reasonable steps to provide meaningful access to services for persons with limited English proficiency.

When City of Douglas / Douglas Rides distributes Federal-aid funds to another entity/person, City of Douglas / Douglas Rides will ensure all sub recipients fully comply with City of Douglas / Douglas Rides Title VI Nondiscrimination Program requirements. The City Manager has delegated the authority to Humberto Rivera, Title VI Program Coordinator, to oversee and implement FTA Title VI requirements.



Jim Russell, City Manager

Non Discrimination Notice to the Public

Notifying the Public of Rights under Title VI and ADA City of Douglas / Douglas Rides

The City of Douglas / Douglas Rides operates its programs and services without regard to race, color, national origin or disability in accordance with Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990 (ADA). Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the City of Douglas / Douglas Rides.

For more information on the City of Douglas / Douglas Rides' civil rights program, and the procedures to file a complaint, contact Humberto Rivera at (520)417-7400 (TTY (520)364-1582); email Humberto.Rivera@douglasaz.gov; or visit our administrative office at 345 E. 16th Street, Douglas, AZ 85607. For more information, visit www.douglasaz.gov

A complainant may file a complaint directly with the Arizona Department of Transportation (ADOT) or the Federal Transit Administration (FTA) by filing a complaint directly with the corresponding offices of Civil Rights: **ADOT**: ATTN: Title VI Program Manager 206 S. 17TH Ave MD 155A RM: 183 Phoenix AZ, 85007 **FTA**: ATTN: Title VI Program Coordinator, East Building, 5th Floor-TCR 1200 New Jersey Ave., SE Washington, DC 20590

If information is needed in another language, contact (520)417-7400. Para información en Español llame: (520)417-7400.

Non Discrimination Notice to the Public - Spanish

Aviso Público Sobre los Derechos Bajo el Título VI Y ADA City of Douglas / Douglas Rides

City of Douglas / Douglas Rides (y sus subcontratistas, si cualquiera) asegura cumplir con el Título VI de la Ley de los Derechos Civiles de 1964, Sección 504 de la Ley de Rehabilitación de 1973 y La Ley de ciudadanos Americanos con Discapacidades de 1990 (ADA). El nivel y la calidad de servicios de transporte serán provehidos sin consideración a su raza, color, o país de origen.

Para obtener más información sobre la City of Douglas / Douglas Rides' programa de derechos civiles, y los procedimientos para presentar una queja, contacte Humberto Rivera al (520)417-7400 (TTY (520)364-1582); email Humberto.Rivera@douglasaz.gov visite nuestra oficina administrativa en 345 E. 16th Street, Douglas, AZ 85607. Para obtener más información, visite www.douglasaz.gov

Puede presentar una queja directamente con Arizona Department of Transportation (ADOT) o Federal Transit Administration (FTA) mediante la presentación de una queja directamente con las oficinas correspondientes de Civil Rights: ADOT: ATTN Title VI Program Manager 206 S. 17th Ave MD 155A RM: 183 Phoenix AZ, 85007 FTA: ATTN Title VI Program Coordinator, East Building, 5th Floor – TCR 1200 New Jersey Ave., SE Washington, DC 20590

The above notice is posted in the following locations: Online and in the public areas of the agency's/transit provider's office(s), City Hall, Fire Department, City Housing Department, and City Library. This notice is also posted at stations, stops, and on transit vehicles.

This notice is posted online at www.douglasaz.gov/283/Public-Transportation

Non Discrimination Complaint Procedures

These procedures provide guidance for all complaints filed under Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990 (ADA) as they relate to any program or activity that is administered by City of Douglas / Douglas Rides, including consultants, contractors and vendors. Intimidation or retaliation as a result of a complaint is prohibited by law. In addition to these procedures, complainants reserve the right to file a formal complaint with other State or Federal agencies or to seek private counsel for complaints alleging discrimination. Every effort will be made to resolve complaints at the lowest possible level.

- (1) Any person who believes he and/or she has been discriminated against on the basis of race, color, national origin, or disability may file a discrimination complaint by completing and submitting the agency's Title VI Complaint Form.
- (2) Formal complaints must be filed within 180 calendar days of the last date of the alleged act of discrimination or the date when the alleged discrimination became known to the complainant(s), or where there has been a continuing course of conduct, the date on which the conduct was discontinued or the latest instance of the conduct.
- (3) Complaints must be in writing and signed by the complainant(s) and must include the complainant(s) name, address and phone number. The ADA/Title VI contact person will assist the complainant with documenting the issues if necessary.
- (4) Allegations received by fax or e-mail will be acknowledged and processed, once the identity of the complainant(s) and the intent to proceed with the complaint have been established. For this, the complainant is required to mail a signed, original copy of the fax or email transmittal for the complaint to be processed.
- (5) Allegations received by telephone will be reduced to writing and provided to the complainant for confirmation or revision before processing. A complaint form will be forwarded to the complainant for him/her to complete, sign and return for processing.
- (6) Once submitted City of Douglas / Douglas Rides will review the complaint form to determine jurisdiction. All complaints will receive an acknowledgement letter informing her/him whether the complaint will be investigated by the City of Douglas / Douglas Rides or submitted to the State or Federal authority for guidance.

City of Douglas / Douglas Rides will investigate Discrimination complaints against its subrecipients; all other Discrimination complaints filed against City of Douglas / Douglas Rides will be investigated by the Arizona Department of Transportation.

- (7) For Discrimination complaints filed against City of Douglas / Douglas Rides: Within **72 hours or 3 (three)** calendar days of receipt, City of Douglas / Douglas Rides will notify ADOT of the Discrimination complaints being filed. The complaint will then be logged identifying its basis of discrimination, the status, and the next steps. ADOT then will assume jurisdiction and follow the ADOT's complaint procedures for investigating the complaint.
- (8) For Discrimination complaints filed against City of Douglas / Douglas Rides subrecipients (ie, consultants, vendors, and contractors) City of Douglas / Douglas Rides will assume jurisdiction and will investigate and adjudicate the case.
- (9) The City of Douglas / Douglas Rides has 3 (three) days to investigate the complaint. If more information is needed to resolve the case, the Authority may contact the complainant. The complainant has 3 (three) business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 3 (three) business days, the Authority can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.
- (10) After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI or ADA violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur.
- (11) A copy of either the closure letter or LOF must be also be submitted to ADOT within 72 hours of that decision. Letters may be submitted by hardcopy or email.
- (12) A complainant dissatisfied with City of Douglas / Douglas Rides decision may file a complaint with the Arizona Department of Transportation (ADOT) or the Federal Transit Administration (FTA) offices of Civil Rights: **ADOT:** ATTN ADA/Title VI Program Coordinator 206 S. 17th Ave MD 155A RM: 183 Phoenix AZ, 85007 **FTA:** Attention Title VI Program Coordinator, East Building, 5th Floor-TCR 1200 New Jersey Ave., SE Washington, DC 20590
- (13) A copy of these procedures can be found online at: www.douglasaz.gov/283/Publictransportation

If information is needed in another language, contact Humberto Rivera at (520)417-7400. Para información en Español llame: Humberto Rivera al (520)417-7400.

Discrimination Complaint Form

Section I:		
Name:		
Address:		
Telephone (Home):	Telephone (Work):	
Electronic Mail Address:		
Accessible Format Requirements?	<input type="checkbox"/> Large Print	<input type="checkbox"/> Audio Tape
	<input type="checkbox"/> TDD	<input type="checkbox"/> Other
Section II:		
Are you filing this complaint on your own behalf?	<input type="checkbox"/> Yes*	<input type="checkbox"/> No
<i>*If you answered "yes" to this question, go to Section III.</i>		
If not, please supply the name and relationship of the person for whom you are complaining.		
Please explain why you have filed for a third party:		
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Section III:		
I believe the discrimination I experienced was based on (check all that apply):		
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin <input type="checkbox"/> Disability		
Date of Alleged Discrimination (Month, Day, Year): _____		
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.		
_____ _____ _____		
Section VI:		
Have you previously filed a Discrimination complaint with this agency?	<input type="checkbox"/> Yes	<input type="checkbox"/> No

If yes, please provide any reference information regarding your previous complaint.

Section V:

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?

☐ Yes ☐ No

If yes, check all that apply:

☐ Federal Agency: _____

☐ Federal Court: _____ ☐ State Agency: _____

☐ State Court : _____ ☐ Local Agency: _____

Please provide information about a contact person at the agency/court where the complaint was filed.

Name:

Title:

Agency:

Address:

Telephone:

Section VI:

Name of agency complaint is against:

Name of person complaint is against:

Title:

Location:

Telephone Number (if available):

You may attach any written materials or other information that you think is relevant to your complaint. Your signature and date are required below

Signature

Date

Please submit this form in person at the address below, or mail this form to:

City of Douglas / Douglas Rides

Humberto Rivera, Transit Manager

345 16th Street

Douglas, AZ 85607

(520) 417-7400

A copy of this form can be found online at www.douglasaz.gov/283/transportation

Formulario de Queja por Discriminacion

Seccion I:		
Nombre:		
Direccion:		
Telefono (Casa):	Telefono (Trabajo):	
Correo Electronico:		
Requisitos de Formato Accessible?	<input type="checkbox"/> Impresion Grande	<input type="checkbox"/> Cinta de Audio
	<input type="checkbox"/> TDD	<input type="checkbox"/> Otro
Seccion II:		
Est presentando esta queja en su propio nombre?	<input type="checkbox"/> Si*	<input type="checkbox"/> No
<i>*Si respondio "Si" a esta pregunta, vaya a la Seccion III.</i>		
De lo contrario, proporcione el nombre y la relacion de la persona por la que se queja.		
Explique por que ha solicitado un tercero:		
Confirme que ha obtenido el permiso de la parte perjudicada si está presentando una demanda en nombre de un tercero.	<input type="checkbox"/> Si	<input type="checkbox"/> No
Seccion III:		
Creo que la discriminacion que experimente se baso en (marque todo lo que corresponda):		
<input type="checkbox"/> Raza <input type="checkbox"/> Color <input type="checkbox"/> Origen Nacional <input type="checkbox"/> Discapacidad		
Fecha de presunta discriminacion (Mes, Dia, Año): _____		
Explique con la mayor claridad posible qué sucedió y por qué cree que fue discriminado. Describe a todas las personas que estuvieron involucradas. Incluya el nombre y la información de contacto de la persona (s) que lo discriminó (si lo conoce), así como los nombres y la información de contacto de los testigos. Si necesita más espacio, utilice la parte de atrás de este formulario.		
_____ _____ _____		
Seccion VI:		
¿Ha presentado anteriormente una queja por discriminación con esta agencia?	<input type="checkbox"/> Si	<input type="checkbox"/> No

En caso afirmativo, proporcione cualquier información de referencia con respecto a su queja anterior.

Seccion V:

¿Ha presentado esta queja ante cualquier otra agencia federal, estatal o local, o ante cualquier tribunal federal o estatal?

☐ Si ☐ No

En caso afirmativo, marque todo lo que corresponda:

☐ Agencia Federal: _____
☐ Tribunal Federal: _____ ☐ Agencia Estatal: _____
☐ Tribunal Estatal: _____ ☐ Agencia Local: _____

Proporcione información sobre una persona de contacto en la agencia / tribunal donde se presentó la queja.

Nombre:

Título:

Agencia:

Dirección:

Teléfono:

Seccion VI:

El nombre de la queja de la agencia está en contra:

La queja del nombre de la persona es contra:

Título:

Ubicación:

Número de Teléfono (si esta disponible):

Puede adjuntar cualquier material escrito u otra información que considere relevante para su reclamo. Su firma y fecha son requeridas a continuación

Firma

Fecha de firma

Envíe este formulario en persona a la dirección que se encuentra a continuación, o envíe este formulario por correo a:

City of Douglas / Douglas Rides
Humberto Rivera, Gerente de Transito
345 16th Street
Douglas, AZ 85607
(520) 417-7400

Puede encontrar una copia de este formulario en línea en www.douglasaz.gov/283/transportation

Discrimination Investigations, Complaints, and Lawsuits

This form will be submitted annually. If no investigations, lawsuits, or complaints were filed, a blank form will be submitted.

Description/Name	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, national origin or disability)	Status	Action(s) Taken (Final findings?)
Investigations				
1)				
2)				
Lawsuits				
1)				
2)				
Complaints				
1)				
2)				

☒ City of Douglas / Douglas Rides has not had any ADA nor Title VI Discrimination complaints, investigations, or lawsuits in **2017**.

*CITY OF DOUGLAS /
DOUGLAS RIDES
Public Participation
Plan*



City of Douglas / Douglas Rides is engaging the public in its planning and decision-making processes, as well as its marketing and outreach activities. The public will be invited to participate in the process whether through public meetings or surveys. As an agency receiving federal financial assistance, **City of Douglas / Douglas Rides** made the following community outreach efforts:

Public hearing on February 14, 2018. Public Notice was published on 01/31/2018 and 02/07/2018

Letters were sent out on January 26, 2018 to local transportation providers regarding the City of Douglas / Douglas Rides intent to request 5311 transportation funding.

Transportation Authority Council (TAC) Quarterly Meetings were held July 2017, October 2017 & February 2018.

In the upcoming year **City of Douglas / Douglas Rides** will make the following community outreach efforts:

Public hearing for yearly 5311 funding on May 2018

Transportation Authority Council (TAC) Quarterly Meetings will be held September 2018, January 2019, April 2019 & July 2019.

Customer Survey will be distributed and riders will be asked for their participation throughout April 2018.

Comment Card will be found in all buses and in the Transit office year round.

Public Meetings:

(1) Public meetings are scheduled to increase the opportunity for attendance by stakeholders and the general public. This may require scheduling meetings during non-traditional business hours, holding more than one meeting at different times of the day or on different days, and checking other community activities to avoid conflicts.

(2) When a public meeting or public hearing is focused on a planning study or program related to a specific geographic area or jurisdiction within the region, the meeting or hearing is held within that geographic area or jurisdiction.

(3) Public meetings are held in locations accessible to people with disabilities and are located near a transit route when possible.

City of Douglas/Douglas Rides submits to the Arizona Department of Transportation annually an application for funding. Part of the annual application is a public notice, which includes a 30-day public

comment period.

Customer Service Survey:

Douglas Rides Customer Service Survey MARCH 2018	
Question # 1	How often do you ride the bus? <input type="radio"/> 1 - 2 times a week <input type="radio"/> 3 - 4 times a week <input type="radio"/> 5 - 6 times a week <input type="radio"/> daily <input type="radio"/> occasionally
Question # 2	What type of rider are you? <input type="radio"/> Adult <input type="radio"/> Senior/Disabled <input type="radio"/> Child/Student <input type="radio"/> Student/Cochise College
Question # 3	Purpose of trip when you use the bus <input type="radio"/> Medical <input type="radio"/> Employment <input type="radio"/> Recreation <input type="radio"/> Education <input type="radio"/> Food City <input type="radio"/> Wal-Mart <input type="radio"/> Downtown <input type="radio"/> JC Penney
Question # 4	Does your service meet your transportation needs? <input type="radio"/> Yes <input type="radio"/> No
Question # 5	Was the driver helpful and courteous? <input type="radio"/> Yes <input type="radio"/> No
Question # 6	How would you rate our customer service? <input type="radio"/> Poor <input type="radio"/> Fair <input type="radio"/> Good <input type="radio"/> Excellent
Question # 7	Was the bus on time? <input type="radio"/> Yes <input type="radio"/> No
Question # 8	Was the bus clean? <input type="radio"/> Yes <input type="radio"/> No
Question #9	Was the dispatcher helpful and courteous? <input type="radio"/> Yes <input type="radio"/> No
Question # 10	Where do you need to go that Douglas Rides doesn't? <input type="radio"/> Tucson <input type="radio"/> other : _____
Question # 11	How many times do you use the Cochise Connection route? <input type="radio"/> 1 - 2 times a week <input type="radio"/> 3 - 4 times a week <input type="radio"/> Occasionally <input type="radio"/> daily <input type="radio"/> Never <input type="radio"/> What is Cochise Connection?
Question # 12	What do you use the Cochise Connection for? <input type="radio"/> Medical <input type="radio"/> Employment <input type="radio"/> Recreation <input type="radio"/> Education
Question # 13	What is the primary route you use? <input type="radio"/> Dial-A-Ride <input type="radio"/> Midtown <input type="radio"/> Pirtleville <input type="radio"/> Cochise Connection <input type="radio"/> Cochise College/Bisbee <input type="radio"/> ACT
Thank you for taking the time to fill out the survey!	

Douglas Rides Encuesta de Atención al cliente Marzo 2018	
Pregunta # 1	Con que frecuencia utiliza el camión? <input type="radio"/> 1 - 2 veces por semana <input type="radio"/> 3 - 4 veces por semana <input type="radio"/> 5 - 6 veces por semana <input type="radio"/> diario <input type="radio"/> ocasionalmente
Pregunta # 2	Usted se considera <input type="radio"/> Adulto <input type="radio"/> Anciano/Discapacidad Física <input type="radio"/> Niños(a)/Estudiante <input type="radio"/> Estudiante/Cochise College
Pregunta # 3	Cual es el propósito de usar el camión? <input type="radio"/> Medico <input type="radio"/> Empleo <input type="radio"/> Recreación <input type="radio"/> Educación <input type="radio"/> Food City <input type="radio"/> Wal-Mart <input type="radio"/> El Centro <input type="radio"/> JC Penney
Pregunta # 4	Siente usted que el servicio cumple con sus necesidades? _____ <input type="radio"/> Sí <input type="radio"/> No
Pregunta # 5	El conductor fue servicial y cortes? <input type="radio"/> Sí <input type="radio"/> No
Pregunta # 6	Como calificaria el servicio al publico? <input type="radio"/> Malo <input type="radio"/> Aceptable <input type="radio"/> Bueno <input type="radio"/> Excelente
Pregunta # 7	Estuvo a tiempo el camión? <input type="radio"/> Sí <input type="radio"/> No
Pregunta # 8	Esta limpio el camión? <input type="radio"/> Sí <input type="radio"/> No
Pregunta # 9	La Recepcionista le fue servicial y cortes? <input type="radio"/> Sí <input type="radio"/> No
Pregunta # 10	A donde necesita ir que el servicio actual no lo lleva? <input type="radio"/> Tucson <input type="radio"/> Otra: _____
Pregunta # 11	¿Con que frecuencia utiliza la ruta Cochise Connection? <input type="radio"/> 1-2 veces por semana <input type="radio"/> 3-4 veces por semana <input type="radio"/> Ocasionalmente <input type="radio"/> diario <input type="radio"/> Nunca <input type="radio"/> Que es Cochise Connection?
Pregunta # 12	¿Cual es la razon que usa la ruta Cochise Connection? <input type="radio"/> Medico <input type="radio"/> Empleo <input type="radio"/> Recreación <input type="radio"/> Educación
Question # 13	Cual es la ruta principal que usted usa? <input type="radio"/> Dial-A-Ride <input type="radio"/> Midtown <input type="radio"/> Pirtleville <input type="radio"/> Cochise Connection <input type="radio"/> Cochise College/Bisbee <input type="radio"/> ACT
Gracias por tomar el tiempo de contestar esta encuesta!	

Comment Card:



"Embracing our Heritage, Advancing our Future"

COMMENT / INTEREST FORM

For comments or questions regarding the City of Douglas / Douglas Rides service; or if you would like to express interest in being appointed to the Transit Advisory Committee, You may fill out this form and return it by mail, email or fax as noted below
Thank you for your comment/interest.

Optional:

Name: _____

Address: _____

Phone Number: _____ **E-Mail Address:** _____

Humberto Rivera – Transit Manager
City of Douglas / Douglas Rides
345 16th Street + Douglas, AZ 85607
520-417-7400+ Fax: 520-364-4475
Humberto.Rivera@douglasaz.gov

CITY OF DOUGLAS / DOUGLAS RIDES

Limited English Proficiency Plan



City of Douglas / Douglas Rides has developed the following Limited English Proficiency Plan (LEP) to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to City of Douglas / Douglas Rides services as required by Executive Order 13166. A Limited English Proficiency person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English.

This plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, training to staff, notification to LEP persons that assistance is available, and information for future plan updates. In developing the plan while determining the City of Douglas / Douglas Rides' extent of obligation to provide LEP services, the City of Douglas / Douglas Rides undertook a U.S. Department of Transportation four-factor LEP analysis which considers the following:

CITY OF DOUGLAS / DOUGLAS RIDES FOUR FACTOR ANALYSIS

Persons with Limited English Proficiency (LEP)	Estimate	% of Persons 5 Yrs. & Over	% of Persons 5 Yrs. & Over With LEP
Total Persons 5 years & Over	16,257	100.0%	---
English Speaking Only	4958	30.5%	---
Limited English Proficiency	11,299	69.5%	100.0%
Spanish with LEP	10,809	66.5%	62%
Other Indo-European languages with LEP	194	1.2%	15%
Asian & Pacific Island languages with LEP	196	1.2%	15%
Other Languages with LEP	100	0.6%	8%

1. Demography: According to the U.S. Census Bureau, 2010-2014, American Community Survey five year estimates, 69.5% of the City of Douglas area population is considered to be Limited English Proficient. This equates to 11,299 individuals five years of age or older who report speaking English less than “very well”. The predominate language spoken by the LEP population is Spanish. Under the DOJ’s Safe Harbor provision, it is necessary to translate materials when five percent or 1,000 persons, whichever is less, speak English less than “very well”. City of Douglas translates vital documents, forms and public notices to meet this requirement.
2. Frequency: The general public comes in contact with City of Douglas / Douglas Rides frequently and all residents are welcome to attend public meetings. To facilitate public participation, City of Douglas / Douglas Rides posts public meeting notices in English and Spanish on its website, in public places and in printed media in an effort to reach a large audience. Initial project planning is initiated at the member agency so there is little public contact at the recommendation phase but City of Douglas / Douglas Rides encourages the member agency to publicize the meeting to receive input from the population at large.
3. Importance: Transportation planning is vital to a community and directly affects the lives of those living in the service area. Recommendation on roads, sidewalks, and public transportation service projects are a focus of both the City of Douglas and regional partners such as SEAGO and CDBG. Projects completed directly affect the residents in the community. This includes the minority and low income populations, including the LEP population.
4. Resources: The City of Douglas / Douglas Rides transit program provides the transit guide in English and Spanish, including all non-discrimination policies and procedures. The City of Douglas / Douglas Rides also has Spanish speaking drivers and staff available to assist passengers and others who may have limited English proficiency.

A statement in Spanish will be included in all public outreach notices. Every effort will be made to provide vital information to LEP individuals in the language requested.

Safe Harbor Provision

City of Douglas / Douglas Rides complies with the Safe Harbor Provision, as evidenced by the number of documents available in the Spanish language. With respect to Title VI information, the following shall be made available in Spanish:

- (1) Title VI Notice
- (2) Complaint Procedures
- (3) Complaint Form

In addition, we will conduct our marketing (including using translated materials) in a manner that reaches each LEP group. Vital Documents include the following:

- (1) Notices of free language assistance for persons with LEP
- (2) Notice of Non-Discrimination and Reasonable Accommodation
- (3) Outreach Materials
- (4) Bus Schedules
- (5) Route Changes
- (6) Public Hearings

+*All our employees are bi-lingual and are able to assist with Spanish translation.

PINTLEVILLE/BAY ACRES ROUTE Monday Through Friday / Lunes a Viernes

Bus Stop	AM Times	PM Times
28 - Columbus Ave. at 1st St.	8:00	1:00
13 - Walnut	8:04	1:04
1 - Transfer Center - 11th St. and G Ave.	8:07	1:07
3 - Community Improvement Association	8:10	1:10
2 - Motor Vehicle Dept. (MVD)	8:14	1:14
4 - Vance - Grove Ave. and Parkside St.	8:16	1:16
5 - Stone Ave. at Douglas Ave.	8:17	1:17
6 - Parkville Store / Mini Mart	8:21	1:21
7 - 28th St. at I Ave.	8:22	1:22
8 - 17th St. at Indian Springs Rd.	8:24	1:24
9 - Walker Center/Douglas Police Dept.	8:25	1:25
10 - Christmas Ave. at 18th St.	8:28	1:28
11 - JC Penney/Elgin	8:31	1:31
12 - Walnut	8:32	1:32
1 - Transfer Center - 11th St. and G Ave.	8:36	1:36

BAY ACRES Monday Through Friday / Lunes a Viernes

Bus Stop	AM Times	PM Times
1 - Transfer Center - 11th St. and G Ave.	8:36	1:36
13 - 28th St. at I Ave.	8:40	1:40
14 - 27th St. at Washington Ave. / Stone	8:45	1:45
15 - 26th St. at Washington	8:46	1:46
16 - 18th St. at Washington Ave.	8:47	1:47
17 - Court City	8:48	1:48
18 - 18th St. and Cornelia - Cornelia Courts	8:52	1:52
19 - 17th St. and Ronda Ave. - Pioneer Village (Stop 1)	8:53	1:53
20 - 18th St. and Cornelia Ave. - Pioneer Village (Stop 2)	8:54	1:54
21 - 18th St. at Ronda Ave.	8:55	1:55
22 - 18th St. at F Ave.	8:56	1:56
23 - 18th St. at F Ave.	8:57	1:57
24 - G Ave. at 18th St.	8:58	1:58

If you live in this area and need a transfer by SATURDAY, please contact the office during working hours to get it up before Friday the day before.

Si vive en esta zona y necesita que le recogen el SATURDAY, por favor llame a la oficina antes de las 4 p.m. del día anterior.

MIDTOWN ROUTE Monday Through Saturday / Lunes a Sábado

Bus Stop	AM Times	PM Times
1 - Transfer Center - 11th St. and G Ave.	8:36	1:36
2 - G Ave. at 18th St.	8:39	1:39
3 - Columbus Ave. at 1st St.	8:40	1:40
4 - Cash Center	8:44	1:44
5 - 18th St. and Christmas Rd.	8:46	1:46
6 - JC Penney / Elgin	8:47	1:47
7 - Walnut	8:48	1:48
8 - St. Vincent / Food Bank at 18th St. and G Ave.	8:51	1:51
9 - G Ave. at 18th St.	8:54	1:54
10 - DARC - 18th St. and F Ave.	8:56	1:56
11 - Transfer Center - 11th St. and G Ave.	8:58	1:58
12 - Columbus Ave. at 1st St.	9:00	2:00
13 - 18th St. at I Ave.	9:02	2:02
14 - 22nd St. and I Ave.	9:04	2:04
15 - 2nd St. at A Ave.	9:06	2:06
16 - A Ave. at 18th St.	9:08	2:08
17 - 18th St. at Florida Ave.	9:11	2:11
18 - 18th St. at San Antonio Ave.	9:13	2:13
19 - 18th St. at Van Horn	9:15	2:15
20 - 18th St. at Roberts Ave.	9:16	2:16
21 - Court City	9:20	2:20
22 - 18th St. at Columbus Ave.	9:24	2:24
23 - 18th St. at F Ave.	9:26	2:26
24 - Transfer Center - 11th St. and G Ave.	9:30	2:30
25 - Cash Center	9:34	2:34
26 - Columbus Ave. at 1st St.	9:36	2:36

Times are approximate and may vary due to traffic and weather conditions. PM times are shown in boldface type.

Los horarios son aproximados y pueden variar debido a las condiciones del tráfico y del clima. Los horarios de mediodía (PM) se muestran en negritas.



Douglas RIDES Rider's Guide



Public Bus Service in Douglas

Servicio Público de Autobuses en Douglas



(520) 384-4474
140 N. 18th St. • Douglas, AZ 85402

www.douglasrides.com

Non-elected Committees Membership Table

A subrecipient who selects the membership of transit-related, non-elected planning boards, advisory councils, or committees must provide a table depicting the membership of those organizations broken down by race. Subrecipients also must include a description of the efforts made to encourage participation of minorities on these boards, councils, and committees.

Table Depicting Membership of Committees, Councils, Broken Down by Race

Body	Caucasian	Latino	African American	Asian American	Native American
17,378	13%	82%	3%	1%	1%
Transit Advisory Committee	50%	50%	0%	0%	0%

The Transit Advisory Committee is appointed by Mayor with the consent of the Council. The Transit Director/Manager shall be part of the committee membership that shall also include representation from the elderly and disabled community, local businesses, and the medical community. Along with publishing notices, notices for public meetings are posted on buses and by word of mouth the drivers notify riders of meetings and encourage them to participate. Members of all represented demographic groups are encouraged to express interest in being appointed to this committee by completing an interest card, which is available on our website and Transit office.

Monitoring for Subrecipient Title VI Compliance

DESCRIBE HOW YOU MONITOR YOUR SUBRECIPIENTS. This can be through site visits, submissions of Title VI Plans annually, or training and surveys

- ✓ City of Douglas does NOT monitor subrecipients for Title VI compliance.

Title VI Training

City of Douglas Finance Director and Transit Manager have attended the 5311 workshop where updates to Title VI were discussed on January 23, 2018.

Yearly PASS trainings are ongoing and Title VI is discussed. The most recent PASS training was held March 17, 2018. Transit Drivers and Transit Manager attended the PASS Training.

Limited English Proficiency Plan (LEP) Training

The goal of staff training is to ensure that all Douglas Rides employees understand LEP policies, procedures and requirements and to ensure that the procedures set forth in this plan are utilized by Douglas Rides staff when working with the public and residents. In addition, it is the goal of Douglas Rides to ensure that staff providing interpretation services to Douglas Rides applicants are sufficiently trained to provide high quality interpreter services.

Douglas Rides will ensure proper training using the following methods:

- Douglas rides shall include a discussion of Douglas Rides responsibilities and procedures in the orientation process for new hires. Each new employee will receive a copy of the LEP plan.
- Douglas Rides will schedule two (2) mandatory training sessions for all employees in which it shall discuss Douglas Rides responsibilities and procedures under this LEP. A log will be kept for all employees attending the training
- Douglas Rides shall identify local and regional training opportunities for appropriate staff regarding how to best perform interpreter services. Staff persons providing interpreter services shall be required to attend such training opportunities where reasonable. Douglas will continue to identify local language service resources.
- Douglas Rides will select appropriately trained staff members and implement an on-going staff to staff training program.

Title VI Equity Analysis

A subrecipient planning to acquire land to construct certain types of facilities must not discriminate on the basis of race, color, or national origin, against persons who may, as a result of the construction, be displaced from their homes or businesses. “Facilities” in this context does not include transit stations or bus shelters, but instead refers to storage facilities, maintenance facilities, and operation centers.

There are many steps involved in the planning process prior to the actual construction of a facility. It is during these planning phases that attention needs to be paid to equity and non-discrimination through equity analysis. The Title VI Equity Analysis must be done before the selection of the preferred site.

Note: Even if facility construction is financed with non-FTA funds, if the subrecipient organization receives any FTA dollars, it must comply with this requirement.

The City of Douglas / Douglas Rides has no current or anticipated plans to develop new transit facilities covered by these requirements. No facilities covered by these requirements were ever developed.

Fixed Route Transit Provider Analysis

Fixed route: Public transit service (other than by aircraft) provided on a repetitive, fixed-schedule basis along a specific route, with vehicles stopping to pick up passengers.

A subrecipient providing fixed route service, as defined above, must determine the distribution of transit amenities or the vehicle assignments for each mode in a non-discriminatory manner. The subrecipient must develop policies to ensure service is not distributed on the basis of race, color, or national origin.

Effective practices to fulfill the Service Standards requirements include developing written policies covering each of the following service indicators:

1) *Vehicle Load for Each Mode*

Douglas Rides load standard is a maximum vehicle load factor of 1.00.

2) *Vehicle Headway for Each Mode*

Fixed route is a single bus route, there are no other buses traveling the route.

3) *On Time Performance for Each Mode*

Douglas Rides defines a bus as late if it departs the “time point” five or more minutes later than the published time. Buses are considered early if they depart from a published time point at any time prior to the scheduled departure.

4) *Service Availability for Each Mode*

Douglas Rides will distribute transit service so that 90% of all residents in the service area are within a ¼ mile walk of bus service.

Effective qualitative practices to fulfill the Service Policy requirements include developing written policies covering each of the following service indicators:

1) *Transit amenities for each mode*

Proposed Policy:

Transit amenities are distributed on a system-wide basis. Transit amenities include shelters and benches. The location of transit amenities is determined by factors such as ridership, individual requests, staff recommendations, and vendor preference (in the case of shelters which feature advertisements).

2) *Vehicle assignments for each mode*

All buses have the same level of amenities (i.e. air conditioning, wheelchair lift), available to riders. Buses are not assigned to specific routes within Douglas Rides service area on vehicle age, but rather to serve specific routes that call for vehicles of differing lengths.

Board Approval for the Title VI Program

City Council approval for the 2018 Title VI Plan will be submitted after ADOT approves our plan.

RESOLUTION NO. 18-1278

A RESOLUTION OF THE MAYOR AND COUNCIL OF THE CITY OF DOUGLAS, COCHISE COUNTY, ARIZONA, APPROVING AND ADOPTING THE UPDATED TITLE VI IMPLEMENTATION PLAN OF THE CIVIL RIGHTS ACT OF 1964, SECTION 504 OF THE REHABILITATION ACT OF 1973, AND THE AMERICANS WITH DISABILITIES ACT OF 1990 (ADA) FOR THE CITY OF DOUGLAS TRANSIT SYSTEM FOR THE CURRENT GRANT CYCLE.

WHEREAS, The Douglas Rides Implementation Plan and Policy for Title VI was approved by Mayor and Council on May 13, 2015, and updated August 10, 2016; therefore, this Implementation Plan needs to be adopted by Mayor and Council for the operation of the local public transit program within its corporate limits and the surrounding communities; and

WHEREAS, as a sub-recipient of funds from the Federal Transit Administration (FTA) through the Arizona Department of Transportation, the City of Douglas (Douglas Rides) has established its Title VI Program Plan in accordance with (FTA C 4702.1B Appendix A-E); and

WHEREAS, these federal transportation funds as distributed by ADOT are to be used in the continued administration of the Douglas Rides program, and as a condition of the receipt of funding, all sub-recipients must adopt a Title VI Program Plan policy statement, along with the required Limited English Proficiency Plan also in place; and

WHEREAS, the Douglas Rides policy assures full compliance with Title VI of the Civil Rights act of 1964, the Restoration Act of 1987, section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act of 1990 (ADA), and related statutes and regulations in all programs and activities; and

NOW, THEREFORE, BE IT RESOLVED, by the Mayor and Council adopting the City of Douglas Rides implementation plan in accordance with Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990 (ADA).

PASSED AND ADOPTED by the Mayor and Council of the City of Douglas, Arizona, this 9th day of May, 2018.

Robert Uribe, Mayor

Approved as to form:

Attest:

Brenda Aguilar, City Clerk

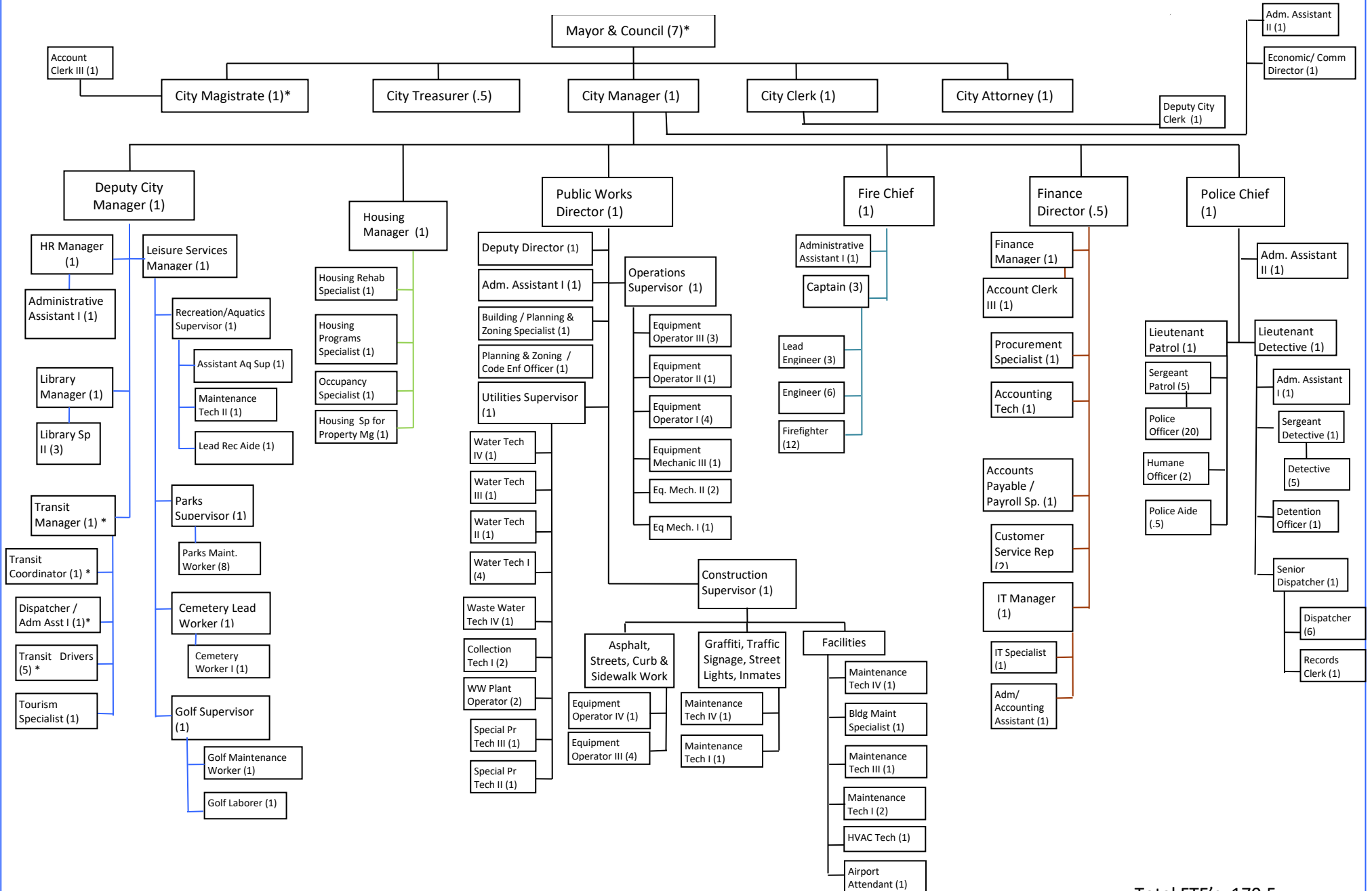
Juan Pablo Flores, City Attorney

Organizational Chart

ATTACH A COPY OF THE ORGANIZATIONAL CHART HERE

City of Douglas Organizational Chart

Fiscal Year 2017-2018



Total FTE's: 170.5
 *not counted as FTEs